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13 14	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION	
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17	LS 134, an individual	Case No. 4:23-cv-03811-JSW
18	Plaintiff,	DECLARATION OF RANDALL S. LUSKEY
19	V.	IN SUPPORT OF DEFENDANTS UBER TECHNOLOGIES, INC. AND RASIER,
20	UBER TECHNOLOGIES, INC.,	LLC'S MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF
21	a Delaware Corporation; RASIER, LLC, a Delaware Limited Liability Company;	ILLINOIS
22	and DOES 1 through 50, Inclusive.	Date: December 1, 2023 Time: 9:00 a.m.
23	Defendants.	Courtroom: 5 – 2nd Floor
24		Action Filed: August 1, 2023 Trial Date: None Set
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DECLARATION OF RANDALL S. LUSKEY

- I, Randall S. Luskey, declare pursuant to 28 U.S.C. § 1746:
- I am an attorney at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, attorneys of record for Defendants Uber Technologies, Inc. and Rasier, LLC (collectively, "Uber"). I respectfully submit this declaration in support of Uber's Motion to Transfer Venue to the Northern District of Illinois. I know the following facts to be true of my own knowledge, except those matters stated to be based on information and belief, and if called to testify, I could competently do so.
- 2. The following are the names and addresses of all persons known to be parties and percipient witnesses to any of the matters raised in the pleadings in this action, and the matters upon which they are expected to testify:
 - As alleged in the Complaint, Plaintiff resides in Illinois and is expected to testify a. as to the events and allegations contained in the Complaint.
 - b. Because no discovery has been performed, there are likely other witnesses in Illinois that have not been identified who may be necessary witnesses on behalf of either party. These witnesses may include, for example, law enforcement personnel to whom the alleged assault was reported, who may testify as to the events and allegations in Plaintiff's Complaint; medical personnel and emergency responders who treated Plaintiff after the alleged assault, who may testify as to the damages and injuries Plaintiff allegedly suffered; and individuals with whom Plaintiff and/or the accused driver spoke about the alleged assault, including, for example, Plaintiff's friend and her boyfriend who Plaintiff was on the way to visit during the ride in which the alleged incident occurred and who encountered Plaintiff soon after the alleged assault, who may testify as to the events and allegations in Plaintiff's Complaint and/or the damages and injuries Plaintiff allegedly suffered.
- 3. Attached as **Exhibit 1** is a true and correct copy of the Superior Court of California for the County of San Francisco's January 23, 2023 Order granting Uber's Motion to Stay or Dismiss Based on Forum Non Conveniens in In re Uber Rideshare Cases, CJC-21-005188.

1	4. Attached as Exhibit 2 is a true and correct copy of the Superior Court of California	
2	for the County of San Francisco's August 11, 2017 Order Granting Uber's Motion to Dismiss	
3	Based on Forum Non Conveniens in Jane Doe v. Uber Techs., Inc., CGC-17-556481.	
4	5. Attached as Exhibit 3 is a true and correct copy of the Superior Court of California	
5	for the County of San Francisco's March 24, 2020 Order Granting Uber's Motion to Stay Based	
6	on Forum Non Conveniens in Jane Doe v. Uber Techs., Inc., CGC-19-579901.	
7	6. Attached as Exhibit 4 is a true and correct copy of the Superior Court of California	
8	for the County of San Francisco's July 1, 2019 Order Granting Uber's Motion to Dismiss Based	
9	on Forum Non Conveniens in Gorne & Walker v. Uber Techs., Inc., CGC-19-575852.	
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11	I declare under penalty of perjury under the laws of the State of California that the foregoing	
12	is true and correct. Executed on September 8, 2023 in San Francisco, California.	
13	/a/ Dandall S. Luckay	
14	/s/ Randall S. Luskey Randall S. Luskey	
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